

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. 23-</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: _____</b>
<b>DONAVON ANTHONY PARISH</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>18 U.S.C. § 2261A(2) (cyberstalking - 4</b>
	<b>:</b>	<b>counts)</b>
	<b>:</b>	<b>18 U.S.C. § 875(c) (interstate</b>
	<b>:</b>	<b>communication of threats - 6 counts)</b>
		<b>Special Finding</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

**BACKGROUND**

At all times material to this indictment:

1. Defendant DONAVON ANTHONY PARISH, a Mississippi resident, used a Voice over Internet Protocol (“VoIP”) service provider to obtain a telephone phone number which could be used from any smart phone, tablet or desktop computer with an internet connection, despite having his own cellular telephone number.
2. VoIP technology allows users to transmit the human voice using a broadband internet connection instead of a cellular or analog telephone line.
3. Business 1, located in the Eastern District of Pennsylvania, is a delicatessen open daily to the public.

**PARISH'S CYBERSTALKING TARGETING BUSINESS 1**

4. Between on or about April 24, 2022 and April 29, 2022, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**DONAVON ANTHONY PARISH,**

with the intent to harass and intimidate employees and owners of Business 1, including S.T., B.S., and J.K., who are known to the grand jury, used a facility of interstate and foreign commerce, that is, the internet, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to employees and owners of Business 1, including S.T., B.S., and J.K.

**PARISH'S COURSE OF CONDUCT TARGETING BUSINESS 1**

5. From in or about April 2022 to in or about May 2022, defendant DONAVON ANTHONY PARISH used VoIP calls to make a series of terroristic threats to individuals at Jewish institutions and organizations (including places of worship) and to individuals at Jewish-owned businesses across the United States. Defendant PARISH used VoIP to mask his identity.

6. In this series of VoIP calls, defendant DONAVON ANTHONY PARISH spoke to individuals answering the telephone on behalf of the institutions, organizations, or businesses. In these calls, defendant PARISH repeatedly referenced Adolf Hitler and the Nazi Party's genocide of approximately six million Jewish people, specifically stating, among other things, "HEIL HITLER," "ALL JEWS SHOULD BURN," "ALL JEWS MUST DIE," "WE WILL PUT YOU IN WORK CAMPS," "GAS THE JEWS," and "HITLER SHOULD HAVE FINISHED THE JOB."

7. Specifically, from on or about April 24 to on or about April 29, 2022, defendant DONAVON ANTHONY PARISH called Business 1 approximately 15 times.

8. During at least one of these calls to Business 1, defendant DONAVON ANTHONY PARISH stated to S.T., “HEIL HITLER.”

9. During other calls to Business 1, defendant DONAVON ANTHONY PARISH stated to B.S., “HEIL HITLER, “ALL JEWS MUST DIE,” and “KILL K\*\*\*S.”

All in violation of Title 18, United States Code, Sections 2261A(2)(B) and 2261(b)(5).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

At all times material to this indictment:

1. Paragraphs 1-3, and 5-9 of Count One are incorporated here.
2. On or about April 24, 2022, in the Eastern District of Pennsylvania, and

elsewhere, defendant

**DONAVON ANTHONY PARISH**

knowingly, with the knowledge that the communication would be viewed as a threat and for the purpose of issuing a threat, transmitted in interstate commerce a communication, that is, an electronic communication transmitting his voice from Mississippi using a VoIP service to Business 1, which contained threats to injure employees and owners of Business 1, including S.T., B.S. and J.K., who are known to the grand jury, and members of the Jewish community.

In violation of Title 18, United States Code, Section 875(c).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

**BACKGROUND**

At all times material to this indictment:

1. Paragraphs 1-2 and 5-6 of Count One are incorporated here.
2. Synagogue 1, located in the Eastern District of Pennsylvania, was a place of Jewish religious worship. Synagogue 1 operated a full day childcare and preschool program for children aged six weeks through five years old. In addition, Synagogue 1 rented its venues for parties, meetings, conferences, and other events including receptions, weddings, festivities, and family milestone celebrations.

**DEFENDANT PARISH'S CYBERSTALKING TARGETING SYNAGOGUE 1**

3. On or about May 2, 2022, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**DONAVON ANTHONY PARISH,**

with the intent to harass and intimidate employees and members of Synagogue 1, including D.H., who is known to the grand jury, used a facility of interstate and foreign commerce, that is, the internet, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to employees and members of Synagogue 1, including D.H.

**DEFENDANT PARISH'S COURSE OF CONDUCT TARGETING SYNAGOGUE 1**

4. On or about May 2, 2022, defendant DONAVON ANTHONY PARISH, using VoIP, called Synagogue 1 approximately five times.
5. During one of these calls to Synagogue 1, defendant DONAVON ANTHONY PARISH repeatedly stated to D.H., "WE WILL PUT YOU IN WORK CAMPS."

6. During another of these calls to Synagogue 1, defendant DONAVON ANTHONY PARISH stated to D.H., “DEATH TO THE JEWS.”

All in violation of Title 18, United States Code, Section 2261A(2)(B) and 2261(b)(5).



**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

At all times material to this indictment:

1. Paragraphs 1-2 and 4-6 of Count Three are incorporated here.
2. On or about May 2, 2022, in Philadelphia, in the Eastern District of Pennsylvania,

and elsewhere, defendant

**DONAVON ANTHONY PARISH**

knowingly, with the knowledge that the communication would be viewed as a threat and for the purpose of issuing a threat, transmitted in interstate commerce a communication, that is, an electronic communication transmitting his voice from Mississippi using a VoIP service to Synagogue 1, which contained a threat to injure employees and members of Synagogue 1, including D.H., who is known to the grand jury, and members of the Jewish community.

In violation of Title 18, United States Code, Section 875(c).

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

**BACKGROUND**

At all times material to this indictment:

1. Paragraphs 1-2 and 5-6 of Count One are incorporated here.
2. Synagogue 2, located in the Eastern District of Pennsylvania, was a place of Jewish religious worship. Synagogue 2 also housed a preschool and kindergarten.

**DEFENDANT PARISH'S CYBERSTALKING TARGETING SYNAGOGUE 2**

3. On or about May 2, 2022, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**DONAVON ANTHONY PARISH,**

with the intent to harass and intimidate employees and members of Synagogue 2, including R.K. and B.B., who are known to the grand jury, used a facility of interstate and foreign commerce, that is, the internet, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to employees and members of Synagogue 2, including R.K. and B.B.

**DEFENDANT PARISH'S COURSE OF CONDUCT TARGETING SYNAGOGUE 2**

4. On or about May 2, 2022, defendant DONAVON ANTHONY PARISH, using VoIP, called Synagogue 2 approximately two times.
5. During one of these calls to Synagogue 2, defendant DONAVON ANTHONY PARISH stated to R.K., "GAS THE JEWS."



6. During another call to Synagogue 2, defendant DONAVON ANTHONY PARISH stated to B.B., "HITLER WAS RIGHT. GAS THE JEWS."

All in violation of Title 18, United States Code, Section 2261A(2)(B) and 2261(b)(5).

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

At all times material to this indictment:

1. Paragraphs 1-2 and 4-6 of Count Five are incorporated here.
2. On or about May 2, 2022, in the Eastern District of Pennsylvania, and elsewhere,

defendant

**DONAVON ANTHONY PARISH**

knowingly, with the knowledge that the communication would be viewed as a threat and for the purpose of issuing a threat, transmitted in interstate commerce a communication, that is, an electronic communication transmitting his voice from Mississippi using a VoIP service to Synagogue 2, which contained a threat to injure employees and members of Synagogue 2, including R.K. and B.B., who are known to the grand jury, and members of the Jewish community.

In violation of Title 18, United States Code, Section 875(c).

**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

**BACKGROUND**

At all times material to this indictment:

1. Paragraphs 1-2 and 5-6 of Count One are incorporated here.
2. Business 2, located in the Eastern District of Pennsylvania, is a delicatessen open daily to the public.

**DEFENDANT PARISH'S CYBERSTALKING TARGETING BUSINESS 2**

3. From on or about April 24, 2022, to on or about April 28, 2022, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**DONAVON ANTHONY PARISH,**

with the intent to harass and intimidate employees and owners of Business 2, including N.D., who is known to the grand jury, used a facility of interstate and foreign commerce, that is, the internet, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to employees and owners of Business 2, including N.D.

**DEFENDANT PARISH'S COURSE OF CONDUCT TARGETING BUSINESS 2**

4. On or about April 24, 2022, defendant DONAVON ANTHONY PARISH, using VoIP, called Business 2 and stated to N.D., "HEIL HITLER" and "ALL JEWS SHOULD BURN."
5. On or about April 28, 2022, defendant DONAVON ANTHONY PARISH, using VoIP, called Business 2 and stated to N.D., "HEIL HITLER" and "ALL JEWS SHOULD BURN," "ALL JEWS MUST DIE," "YOU ARE TERRIBLE, F\*\*K YOU ... HEIL HITLER."

All in violation of Title 18, United States Code, Section 2261A(2)(B) and 2261(b)(5).

**COUNT EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

At all times material to this indictment:

1. Paragraphs 1-2 and 4-5 of Count Seven are incorporated here.
2. On or about April 28, 2022, in the Eastern District of Pennsylvania, and

elsewhere, defendant

**DONAVON ANTHONY PARISH**

knowingly, with the knowledge that the communication would be viewed as a threat and for the purpose of issuing a threat, transmitted in interstate commerce a communication, that is, an electronic communication transmitting his voice from Mississippi using a VoIP service to Business 2, which contained a threat to injure employees and owners of Business 2, including N.D., who is known to the grand jury, and members of the Jewish community.

In violation of Title 18, United States Code, Section 875(c).

**COUNT NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1-2 and 5-6 of Count One are incorporated herein by reference.
2. Business 3, located in the Eastern District of Pennsylvania, is a delicatessen open daily to the public.
3. On or about April 28, 2022, in the Eastern District of Pennsylvania, and elsewhere, defendant

**DONAVON ANTHONY PARISH**

knowingly, with the knowledge that the communication would be viewed as a threat and for the purpose of issuing a threat, transmitted in interstate commerce a communication, that is, an electronic communication transmitting his voice from Mississippi using a VoIP service to Business 3, which contained a threat to injure employees and owners of Business 3, including J.I. and J.M., who are known to the grand jury, and members of the Jewish community, by stating, “GAS THE JEWS” and “BURN ALL JEWS.”

In violation of Title 18, United States Code, Section 875(c).

**COUNT TEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

At all times material to this indictment:

1. Paragraphs 1-2 and 5-6 of Count One are incorporated here.
2. Synagogue 3, located in the Eastern District of Pennsylvania, was a place of Jewish religious worship.
3. On or about May 2, 2022, in the Eastern District of Pennsylvania, and elsewhere, defendant

**DONAVON ANTHONY PARISH**

knowingly, with the knowledge that the communication would be viewed as a threat and for the purpose of issuing a threat, transmitted in interstate commerce a communication, that is, an electronic communication transmitting his voice from Mississippi using a VoIP service to Synagogue 3, which contained a threat to injure employees and members of Synagogue 3, including Z.G, who is known to the grand jury, and members of the Jewish community, by stating, “GAS THE JEWS” and “HITLER SHOULD HAVE FINISHED THE JOB.”

In violation of Title 18, United States Code, Section 875(c).



**SPECIAL FINDING**

**THE GRAND JURY FURTHER CHARGES THAT:**


Defendant DONAVON ANTHONY PARISH intentionally selected Businesses 1 – 3 and Synagogues 1 – 3, as the objects of the offenses charged in Counts One through Ten of this Indictment, which are incorporated by reference, because of the actual and perceived religion of individuals associated with Businesses 1 – 3 and Synagogues 1 – 3.

In violation of U.S.S.G. § 3A1.1(a).

**A TRUE BILL:**



**FOREPERSON**

  
**JACQUELINE C. ROMERO**  
**UNITED STATES ATTORNEY**

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

Eastern District of Pennsylvania

Criminal Division

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**THE UNITED STATES OF AMERICA**

vs.

**DONAVON ANTHONY PARISH**

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**INDICTMENT**

**Counts**

18 U.S.C. § 22614(2) (cyberstalking – 3 counts)

18 U.S.C. § 875(c) (interstate communication of threats - 6 counts)

Special Finding

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Filed in open court this \_\_\_\_\_ day.

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Bail, \$ \_\_\_\_\_

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